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8 *Attorneys for Defendant State of California*
9 *(by and through the California Highway Patrol)*
10 *[erroneously sued as "State of California"]*
and Michael Bell

11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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16 **EDGAR SOLIS,**

17 Plaintiff,

18 v.

19 **COUNTY OF RIVERSIDE; STATE**
20 **OF CALIFORNIA; SALVADOR**
21 **WALTERMIRE; and DOES 1-10,**
inclusive,

22 Defendants.

5:23-cv-00515-HDV-JPR

**DECLARATION OF DAVID
KLEHM IN SUPPORT OF
DEFENDANTS' OPPOSITION TO
PLAINTIFF'S MOTION IN
LIMINE NO. 2 TO EXCLUDE
SPECULATIVE AND
PREJUDICIAL INFORMATION**

Date: October 1, 2024

Time: 9:00 a.m.

Courtroom: 10D

Judge: *Honorable Hernán D.
Vera*

Trial Date: October 29, 2024

Action Filed: 2/02/2023

23 **DECLARATION OF DAVID KLEHM**

24
25 I, David Klehm, declare as follows:

26
27 1. I am a duly appointed Deputy Attorney General and am assigned to
28

1 represent defendants in the above-captioned action. I make this declaration in
2 support of the attached motion. The facts set forth herein are within my
3 personal knowledge.

4 2. Attached hereto as Exhibit "A" are true and correct excerpts from the
5 transcript of the Deposition of Michael Bell taken on May 8, 2024.

6 3. The Regional Gang Task Force is the official name of the unit my client,
7 CHP Officer Michael Bell was assigned to at the time Officer Bell arrested
8 plaintiff, Edgar Solis, on March 2, 2022, as also indicated on the official website of
9 the Riverside County Sheriff Department in the following link:

10 <https://www.riversidesheriff.org/780/Gang-Task-Force>

11 I declare under penalty of perjury under the laws of the United States of
12 America that the foregoing is true and correct.

13 Executed on September 23, 2024, at San Diego, California.

14 /s/ David Klehm

15 David Klehm

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EXHIBIT A

EDGAR SOLIS vs COUNTY OF RIVERSIDE, ET AL.
Officer Michael Bell on 05/08/2024

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1 Region 3, my immediate supervisor was Sergeant Paez at the
2 time.

3 Q. And Sergeant Paez is a Hemet officer?

4 A. He's a Hemet -- he was a Hemet sergeant.

5 Q. Do you know what he is now?

6 A. I believe he's a Hemet P.D. Lieutenant.

7 Q. Was Hemet in charge of the task force?

8 A. No. I'm not -- no, not overall and I'm not sure
9 on all -- not -- I don't know a whole lot about the upper
10 chain command for it.

11 Q. Did the task force also include Riverside County
12 Sheriffs Department?

13 A. Yes.

14 Q. Did the Hemet officers, C.H.P. officers and
15 county deputies ever train together?

16 MR. KLEHM: I'm going to say you mean as part of
17 the Gang Task Force?

18 Q. BY MR. SINCICH: Yes, for the Gang Task Force.

19 A. Yes.

20 Q. Okay. How often did you train together as a
21 team?

22 A. I don't recall. There would be like formal,
23 formal and informal. And it was irregular. It wasn't a
24 regular training schedule for us. It was like extra for
25 the most part actually.